

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|                        |   |                        |
|------------------------|---|------------------------|
| Robert Dedmon,         | § | CIVIL ACTION NO.       |
| Plaintiff,             | § | 4:21-cv-03371          |
|                        | § |                        |
|                        | § | JUDGE CHARLES ESKRIDGE |
| vs.                    | § |                        |
|                        | § | Jury Demand            |
| Shell Exploration &    | § |                        |
| Production Company and | § |                        |
| Shell Trading Services | § |                        |
| Company,               | § |                        |
| Defendants.            | § |                        |

**PLAINTIFF ROBERT DEDMON'S EXHIBIT LIST**

Robert Dedmon may offer or use any exhibit listed on Defendants' exhibit list.

| No. | DESCRIPTION  | OFFER | OBJECT | DATE<br>ADMIT | DATE<br>N/ADMIT |
|-----|--|-------|--------|---------------|-----------------|
|     |  |       |        |               |                 |
|     | 2014<br>qualifications   |       |        |               |                 |
|     |  |       |        |               |                 |
|     | Dedmon resume<br>[ShellDedmon 766-767]   |       |        |               |                 |
|     | Frnka LinkedIn profile<br>[Dedmon 2832]  |       |        |               |                 |
|     | November 25, 2014 email Patrick<br>Frnka steep learning curve<br><br>[ShellDedmon 864]                                   |       |        |               |                 |
|     |  |       |        |               |                 |
|     | 2014<br>hiring process   |       |        |               |                 |
|     |  |       |        |               |                 |
|     | January 17 & 22, 2014 emails<br>[Williams, Dedmon]<br><br>[Dedmon 762-763]   |       |        |               |                 |
|     | January 24, 2014 email invitation to<br>apply for sales representative job<br><a href="#">4089BR</a><br><br>[Dedmon 811] |       |        |               |                 |
|     | January 24 & 31, 2014 & February<br>3, 2014 emails<br>[Williams, Dedmon]<br><br>[Dedmon 827]                             |       |        |               |                 |
|     | January 25, 2014 application<br>acknowledgement<br><br>[Dedmon 834]  |       |        |               |                 |

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|  | February 2014 calendar<br><br>[Dedmon 2830]  |  |  |  |  |
|  | February 1, 2014 emails about<br>initial teleconference on February 4<br><br>[Dedmon 849-854]  |  |  |  |  |
|  | February 3, 2014 email string<br>between Carl Williams and Robert<br>Dedmon about phone interview with<br>Shell—top 3 candidates<br><br>[Dedmon 826] |  |  |  |  |
|  | February 6, 2014 email string<br>between Kendra Williams and<br>Robert Dedmon about job<br>compensation transparency<br>[Dedmon 855-861]             |  |  |  |  |
|  | February 12, 2014 emails about<br>February 18 interview<br><br>[Dedmon 862, <a href="#">833</a> ]  |  |  |  |  |
|  | February 14, 2014 emails about<br>sales representative job <a href="#">4089BR</a><br><br>[Dedmon 830-831]  |  |  |  |  |
|  | February 19, 2014 post-interview<br>email<br>[Dedmon, Allie]<br><br>[Dedmon 835]   |  |  |  |  |
|  | March 2014 calendar<br><br>[Dedmon 2831]   |  |  |  |  |

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|  | <p>March 1, 2014 promotion that led to loss of JG5 position in Houston (duplicate in exhibit list)</p> <p>[ShellDedmon 705]</p>                                    |  |  |  |  |
|  | <p>February 19, 2014 &amp; March 13, 2014 emails<br/>[Williams, Dedmon]</p> <p>[Dedmon 805]</p>  |  |  |  |  |
|  | <p>March 4, 2014 email from Robert Dedmon to Tyler Allie requesting update about job</p> <p>[Dedmon 829]</p>   |  |  |  |  |
|  | <p>2014-03-14 email string between Carl Williams and Robert Dedmon about candidates for the job<br/>[Dedmon 803-809]</p>   |  |  |  |  |
|  | <p>March 31, 2014 emails about downgrading JG and differential treatment based on race<br/>[Hartnett, Rangan, Bowman, Rozelle, Olmen]</p> <p>[ShellDedmon 706]</p> |  |  |  |  |
|  | <p>April 2-3, 2014 emails about JG downgrade<br/>[Hartnett, Rangan, Bowman, Rozelle, Olmen]</p> <p>[ShellDedmon 705]</p>   |  |  |  |  |
|  | <p>April 15, 2014 emails transferring request to make job offer at JG5<br/>[Olmen, Rangan, Rozelle]</p> <p>[ShellDedmon 813]</p>                                   |  |  |  |  |

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|  | <p>April 17, 2014 email denying request to offer job at JG5 but agreeing to work with recruiting to keep candidate “warm”<br/>[Olmen, Rangan, Hartnett, Rozelle]</p> <p>[ShellDedmon 717]</p>  |  |  |  |  |
|  | <p>April 22, 2014 email requesting to offer job at JG6 to Dedmon, with compensation competitive to skill set so possibly at higher end of pay range; again expresses discomfort over race differential<br/>[Rangan, Olmen, Hartnett, Rozelle, Bowman]</p> <p>[ShellDedmon 716]</p> |  |  |  |  |
|  | <p>April 22-23, 2014 email string, same subject but with April 23, 2014 promise to respond tomorrow<br/>[Olmen, Rangan, Hartnett, Foltz, Bowman]</p> <p>[ShellDedmon 722]</p>  |  |  |  |  |
|  | <p>April 23, 2014 emails showing Shell excuse for job grade</p> <p>[Dedmon 766]</p>  |  |  |  |  |
|  | <p>April 24, 2014 9:01 a.m. email Hartnett to Bowman, Rangan reiterating would like to offer power sale representative job to Dedmon; addresses qualifications and experience; attaches resume</p> <p>[ShellDedmon 726]</p>  |  |  |  |  |

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|  | <p>April 24, 2014 emails with false claims of lack of sales experience and questioning for the first time Dedmon's qualifications, Hartnett OMG response<br/>[Sutton, Olmen, Bowman, Rangan]</p> <p>[ShellDedmon 730-731, 725]</p> |  |  |  |  |
|  | <p>April 24-25, 2014 emails about qualifications; requesting interview and selection notes<br/>[Rangan, Olmen, Hartnett, Rozelle]</p> <p>[ShellDedmon 732]</p>   |  |  |  |  |
|  | <p>April 25, 2014 email response showing Dedmon qualifications<br/>[Hartnett, Bowman, Sutton, Rangan]</p> <p>[ShellDedmon 735-736]</p>   |  |  |  |  |
|  | <p>April 25, 2014 email string including response that HR has concerns about this particular candidate and will evaluate whether any offer is made at all</p> <p>[ShellDedmon 738]</p>   |  |  |  |  |
|  | <p>April 29, 2014 email from Rangan about hire situation, no difference in job duties, and prior hires without direct sales experience</p> <p>[ShellDedmon 751]</p>  |  |  |  |  |
|  | <p>May 1, 2014 Rangan email about EO report</p> <p>[ShellDedmon 753]</p>   |  |  |  |  |

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|  | May 12, 2014 Olmen email about EO report and belief she was following policy<br><br>[ShellDedmon 802]  |  |  |  |  |
|  | May 19, 2014 emails about posting JG6 job as new position, though tasks are the same<br><br>[Shell Dedmon 758, 768]  |  |  |  |  |
|  | June 4, 2014 Rangan email about pending EO investigation<br><br>[ShellDedmon 778]  |  |  |  |  |
|  | June 19-20, 2014 emails about re-applying for sales representative, again shows Shell excuse for job grade<br><br>[Dedmon 838-840, <a href="#">841-848</a> ] |  |  |  |  |
|  | June 22, 2014 emails inviting Dedmon to apply for sale representative job <a href="#">8401BR</a><br><br>[Dedmon 810]   |  |  |  |  |
|  | June 30, 2014 email interview that afternoon<br><br>[Dedmon 832-833]   |  |  |  |  |
|  | July 9, 2014 emails with benefits attachments, question about sign-on bonus<br><br>[Dedmon 798]  |  |  |  |  |

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|  | July 9-10, 2014 emails about sign on bonus and hard copy of offer letter<br><br>[Dedmon 801]   |  |  |  |  |
|  | July 11, 2014 welcome emails after (oral) employment acceptance<br><br>[Dedmon 479-480]  |  |  |  |  |
|  | July 11, 2014 Shell Exploration & Production Company conditional employment offer signed July 13, 2014<br><br>[ShellDedmon 113-116]      |  |  |  |  |
|  | July 11, 2014 email about “regret” for sales representative job <a href="#">4089BR</a><br><br>[Dedmon 803]                               |  |  |  |  |
|  | July 24, 2014 pre-employment screening cleared, start date August 19, 2014<br><br>[Dedmon 769]   |  |  |  |  |
|  | August 7, 2014 email confirming offer of employment, start date August 19, 2014, need to complete new hire paperwork<br><br>[Dedmon 792] |  |  |  |  |
|  | 2014 JG5-6 pay ranges<br><br>[ShellDedmon 64]  |  |  |  |  |
|  | Teri Ramsey (Olmen) LinkedIn profile<br><br>[Dedmon 2827-2828]   |  |  |  |  |



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|  | 2015  |  |  |  |  |
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|  | February 10-11, 2015 emails about power sales position<br>[ShellDedmon 849-857]                             |  |  |  |  |
|  | February 19, 2015 emails about power sales position<br>[ShellDedmon 893]                                    |  |  |  |  |
|  | February 21 2015 job grade transfer for Robert Dedmon<br>[ShellDedmon 99-100]                               |  |  |  |  |
|  |   |  |  |  |  |
|  | 2020<br>revelation and<br>prompt pursuit of rights  |  |  |  |  |
|  |   |  |  |  |  |
|  | 2020-06-07 text message from Sri Rangan to Robert Dedmon<br>[Dedmon 2822]                                   |  |  |  |  |
|  | October 16, 2020<br>charge of discrimination<br>[ShellDedmon 65-67]   |  |  |  |  |
|  | April 20, 2021 email sending 2014 JG5-6 pay ranges (duplicate on exhibit list)<br>[ShellDedmon 64]          |  |  |  |  |
|  | May 17, 2021 Shell's EEOC Position Statement<br>[Dedmon 449-452]  |  |  |  |  |
|  | May 17, 2021 Shell's EEOC Position Statement [Attachment B Anti-Harassment Policy for 2020]<br>[Dedmon 404] |  |  |  |  |

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|  | May 17, 2021 Shell's EEOC Position Statement [Attachment C 2015 Code of Conduct]<br><br>[Dedmon 405-448]  |  |  |  |  |
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|  | 2021<br>man down on team<br>and need to fill spot   |  |  |  |  |
|  |   |  |  |  |  |
|  | undated job broadcast form<br><br>[ShellDedmon 1087-1093]   |  |  |  |  |
|  | September 14, 2021 email from M. Tickle<br><br>[ShellDedmon 1073]   |  |  |  |  |
|  |   |  |  |  |  |
|  | pay disparities<br>and damages  |  |  |  |  |
|  |   |  |  |  |  |
|  | pay stubs<br><br>ShellDedmon 1137<br>ShellDedmon 1615<br>ShellDedmon 2860<br>ShellDedmon 3659<br>ShellDedmon 1160<br>ShellDedmon 1660<br>ShellDedmon 2903<br>ShellDedmon 3700<br>ShellDedmon 1184<br>ShellDedmon 1707<br>ShellDedmon 2931<br>ShellDedmon 3742<br>ShellDedmon 1218<br>ShellDedmon 1776<br>ShellDedmon 2987<br>ShellDedmon 3808<br>ShellDedmon 1245<br>ShellDedmon 1464 |  |  |  |  |

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|  | ShellDedmon 1829<br>ShellDedmon 3032<br>ShellDedmon 3857<br>ShellDedmon 1272<br>ShellDedmon 1491<br>ShellDedmon 1882<br>ShellDedmon 3060<br>ShellDedmon 3910<br>ShellDedmon 1297<br>ShellDedmon 1516<br>ShellDedmon 1931<br>ShellDedmon 3965<br>ShellDedmon 1322<br>ShellDedmon 1541<br>ShellDedmon 1980<br>ShellDedmon 4010<br>ShellDedmon 4720<br>ShellDedmon 4722<br>ShellDedmon 4735<br>ShellDedmon 4727<br>ShellDedmon 4724<br>ShellDedmon 4719<br>ShellDedmon 4721<br>ShellDedmon 4733<br>ShellDedmon 4725<br>ShellDedmon 4723 |  |  |  |  |
|  | Federal Rule of Evidence 1006<br>summary of pay differentials:<br>Dedmon, Frnka, Kolkmann, Smith<br><br>[Dedmon 2823]  |  |  |  |  |
|  | Shell 2020 mid marketer<br>organizational chart<br><br>[ShellDedmon 1094]  |  |  |  |  |

|  | performance reviews  |  |  |  |  |
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|  | 2014-2023 performance reviews—<br>Robert Dedmon<br><br>[ShellDedmon 4292-4328] |  |  |  |  |
|  | 2015-2023 performance reviews—<br>Michael Deley<br><br>[ShellDedmon 4329-4358] |  |  |  |  |
|  | 2014-2023 performance reviews—<br>Patrick Frnka<br><br>[ShellDedmon 4359-4402] |  |  |  |  |
|  | 2014-2023 performance reviews—<br>Jennifer Hartnett<br>[ShellDedmon 4403-4449] |  |  |  |  |
|  | 2014-2023 performance reviews—<br>Doug Hund<br><br>[ShellDedmon 4450-4491]     |  |  |  |  |
|  | 2014-2023 performance reviews—<br>Ryan Kolkmann<br>[ShellDedmon 4492-4519]     |  |  |  |  |
|  | 2019-2023 performance reviews—<br>Logan Luzzi<br><br>[ShellDedmon 4520-4529]   |  |  |  |  |
|  | 2014-2020 performance reviews—Sri<br>Rangan<br><br>[ShellDedmon 4530-4555]     |  |  |  |  |

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|         | 2014-2019 performance reviews—<br>Patty Smith<br><br>[ShellDedmon 4556-4598]          |  |  |  |  |
|         | 2014-2023 performance reviews—<br>Susan Smith<br><br>[ShellDedmon 4599-4637]          |  |  |  |  |
|         | 2014-2023 performance reviews—<br>Michael Tickle<br><br>[ShellDedmon 4638-4710]       |  |  |  |  |
|         |   |  |  |  |  |
| damages |   |  |  |  |  |
|         |   |  |  |  |  |
|         | 2022-2023 Confidential medical<br>records [Turner]<br><br>[Dedmon2415-2436]           |  |  |  |  |
|         | 2023 Confidential medical records<br>[Davis]<br><br>[Dedmon 2437-2446]                |  |  |  |  |
|         | April 10, 2023 Expert Disclosures<br>[Jasmine Turner LPC Bio]<br><br>[Dedmon 481-489] |  |  |  |  |
|         | April 10, 2023 Expert Disclosures<br>[Anatomy of Anxiety graphic]<br><br>[Dedmon 490] |  |  |  |  |
|         | April 10, 2023 Expert Disclosures<br>[brain graphic]<br><br>[Dedmon 491]              |  |  |  |  |
|         | April 10, 2023 Expert Disclosures<br>[labeled brain graphic]<br><br>[Dedmon 492]      |  |  |  |  |
|         | Headshot picture of Robert Dedmon<br><br>[Dedmon 972]                                 |  |  |  |  |

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|  | Picture of Robert Dedmon at Shell<br>[Dedmon 2823]  |  |  |  |  |
|  | Robert Dedmon family pictures<br>[Dedmon 1439-1465; 2824-2826]  |  |  |  |  |
|  | Picture—international day for the<br>elimination of racial discrimination<br>[Dedmon 2829]                          |  |  |  |  |
|  |   |  |  |  |  |
|  | Shell policies  |  |  |  |  |
|  | 2001 Shell website policy—an<br>inclusive workplace<br>[Dedmon 1003-1006]   |  |  |  |  |
|  | 2005 Shell sustainability report<br>[Dedmon 1014-1058]  |  |  |  |  |
|  | 2006 Shell sustainability report<br>[Dedmon 1129-1173]  |  |  |  |  |
|  | 2010 code-of-conduct-english on<br>2014 website<br>[Dedmon 201-240]   |  |  |  |  |
|  | 2010 diversity-inclusion brochure<br>linked on the 2014 website<br>[Dedmon 248-256]                                 |  |  |  |  |
|  | 2012 in review – numbers Royal<br>Dutch Shell plc Sustainability<br>Report on 2014-07 Shell website<br>[Dedmon 257] |  |  |  |  |

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|  | 2012 Royal Dutch Shell plc<br>Sustainability Report - Social data<br>on 2014-07 Shell Website<br><br>[Dedmon 259] |  |  |  |  |
|  | 2014 Shell website entire_shell_sr13<br>[Sustainability Report]<br>[No bates number]                              |  |  |  |  |
|  | 2014 Shell Annual Report<br>[Dedmon 1-200]  |  |  |  |  |
|  | 2014 Shell website eeoc gina<br>supplement<br>[Dedmon 241]  |  |  |  |  |
|  | 2014 Shell website eeoc self print<br>poster<br>[Dedmon 242-243]  |  |  |  |  |
|  | 2014 Shell website Trading - United<br>States<br>[Dedmon 244]   |  |  |  |  |
|  | 2014 Shell general business<br>principles<br>[Dedmon 1007-1013]   |  |  |  |  |
|  | July 2014 Shell website - Our<br>people - Shell Global<br>[Dedmon 245-246]  |  |  |  |  |
|  | July 2014 Shell website - Diversity<br>and inclusion – our approach - Shell<br>Global<br>[Dedmon 247]             |  |  |  |  |
|  | 2015 Shell Code of Conduct English<br>[Dedmon 260-303]  |  |  |  |  |
|  | 2015 Shell Annual Report<br>[No bates number]   |  |  |  |  |

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|  | 2020 Shell united states racial<br>diversity equity and inclusion plan<br>[Dedmon 312-314]  |  |  |  |  |
|  | 2016 Barnes v. Shell example of<br>helpline complaint memo<br>[Dedmon 1512-1518]  |  |  |  |  |
|  | 2020 Shell Website Race and Equity<br>Combined Contents<br>[Dedmon 315-319]   |  |  |  |  |
|  | 2020 Shell Annual Report<br>[No bates number]   |  |  |  |  |
|  | 2020 Shell ethics and compliance<br>manual<br><br>[Dedmon 1059-1128]  |  |  |  |  |
|  | 2021 shell annual report<br>[No bates number]   |  |  |  |  |
|  | March 2021 Shell Global Helpline<br>data privacy policy<br><br>[Dedmon 1331-1335]   |  |  |  |  |
|  | May 17, 2021 Shell's EEOC Position<br>Statement [Attachment A EO Policy<br>for 2020] (duplicate on exhibit list)<br><br>[Dedmon 403]                  |  |  |  |  |
|  | May 17, 2021 Shell's EEOC Position<br>Statement [Attachment B Anti-<br>Harassment Policy for 2020]<br>(duplicate on exhibit list)<br><br>[Dedmon 404] |  |  |  |  |



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|  | May 17, 2021 Shell's EEOC Position Statement [Attachment C 2015 Code of Conduct] (duplicate on exhibit list)<br><br>[Dedmon 405-448] |  |  |  |  |
|  | 2022 website shell global helpline<br><br>[Dedmon 1226-1230]   |  |  |  |  |
|  | 2023 Shell website [de&i]<br>[Dedmon 988-1000]   |  |  |  |  |
|  | 2023 Shell website [fair pay policy]<br><br>[Dedmon 1001-1002]   |  |  |  |  |
|  | February 2024 Shell website fact sheet<br><br>[Dedmon 2820-2821]   |  |  |  |  |
|  |  |  |  |  |  |
|  | Shell knowledge and history of discrimination  |  |  |  |  |
|  |  |  |  |  |  |
|  | 1996 nyt shell oil's own little problem<br><br>[Dedmon 2410-2414]  |  |  |  |  |
|  | 2006 DOL press release re Shell E&P<br><br>[Dedmon 2818-2819]  |  |  |  |  |
|  | 2012 harvard business school global diversity and Inclusion at Royal Dutch Shell<br><br>[No bates number]                            |  |  |  |  |

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|  | 2014-2021 Shell EEO-1 Reports<br><br>[Dedmon 973-987]                            |  |  |  |  |
|  | 2017-10-27 Rodriguez v. Shell charge of discrimination<br><br>[Dedmon 2714-2717] |  |  |  |  |
|  | 2018 Shater Case Shell Oil EEOC Position Statement<br><br>[Dedmon 320-343]       |  |  |  |  |
|  | 2020 Shell UK diversity-pay-gap-report<br><br>[Dedmon 304-311]                   |  |  |  |  |
|  | 2020-10-05 Shur v. Shell charge of discrimination<br><br>[Dedmon 2718-2725]      |  |  |  |  |
|  | 2021 shell uk pay gap report<br><br>[Dedmon 2759-2772]                           |  |  |  |  |
|  | July 16, 2021 Sheikh v. Shell charge of discrimination<br><br>[Dedmon 2639-2644] |  |  |  |  |
|  | 2021-09 oilman magazine gaurdie banister]<br><br>[Dedmon 2374-2388]              |  |  |  |  |
|  | 2022 shell uk pay gap report]<br><br>[Dedmon 2773-2793]                          |  |  |  |  |

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|  | 2023 shell uk pay gap report] |  |  |  |  |
|  | [Dedmon 2794-2817]            |  |  |  |  |
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Date: February 10, 2025

Respectfully submitted,

*/s/ Amy Gibson*

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Ms. Amy E. Gibson  
Attorney-in-Charge  
Texas State Bar No. 00793801  
Southern District Bar No. 20147  
[amy@gwfirm.com](mailto:amy@gwfirm.com)

Mr. David L. Wiley  
Of Counsel  
Texas State Bar No. 24029901  
Southern District Bar No. 34134  
[david@gwfirm.com](mailto:david@gwfirm.com)

Gibson Wiley PLLC  
1500 Jackson Street #109  
Dallas, Texas 75201-4923  
T: (214) 522-2121  
F: (214) 522-2126

*and*

Ms. Amanda C. Hernandez  
Of Counsel  
Texas State Bar No. 24064411  
Southern District Bar No. 1531045  
[amanda@ahfirm.com](mailto:amanda@ahfirm.com)

AH Law, PLLC  
5718 Westheimer, Suite 1000  
Houston, Texas 77057  
T: (713) 588-4359  
F: (281) 572-5370

*Attorneys for Robert Dedmon*